

EXHIBIT 1

**SCOTT+SCOTT,
ATTORNEYS AT LAW, LLP**



MISSION STATEMENT

Scott+Scott, Attorneys at Law, LLP (“Scott+Scott” or the “Firm”) is a nationally recognized law firm headquartered in Connecticut with offices in New York, California, Ohio, and London, England. The Firm was founded in 1975 and now has approximately 60 attorneys dedicated to complex and class action litigation, representing individuals, businesses, and public and private pension funds that have suffered from corporate fraud and wrongdoing. Scott+Scott is directly responsible for recovering billions of dollars and achieving substantial corporate governance reforms on behalf of its clients. Scott+Scott has significant expertise in complex consumer, antitrust, securities, and civil rights litigation in both federal and state courts.

COMPETITION PRACTICE GROUP

Scott+Scott is one of the premier advocates in the area of consumer protection and antitrust law. The Firm has extensive experience leading and litigating data breach class actions brought on behalf of financial institutions, including, for example: *In re The Home Depot, Inc., Customer Data Security Breach Litigation*, MDL No. 2583 (N.D. Ga.) (co-lead counsel); *First Choice Federal Credit Union v. The Wendy’s Co.*, No. 2:16-cv-00506 (W.D. Pa.) (co-lead counsel); *Bellwether Community Credit Union v. Chipotle Mexican Grill*, No. 1:17-cv-01102 (D. Colo.) (co-lead counsel); and *In re Target Corporation Customer Data Security Breach Litigation*, MDL No. 2522 (D. Minn.) (plaintiffs’ steering committee). Scott+Scott also currently serves as co-lead counsel in a number of complex class actions brought on behalf of consumers and businesses harmed by fraudulent and anticompetitive conduct, including *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 1:13-cv-07789 (S.D.N.Y.), alleging a conspiracy to manipulate the benchmark rate in the foreign exchange market, the world’s largest and most actively traded financial market (over \$2.2 billion in settlements negotiated to date).

Scott+Scott and its attorneys in the Competition Practice Group also have a proven track record of obtaining significant recoveries:

- *Dahl v. Bain Capital Partners, LLC*, No. 1:07-cv-12388 (D. Mass) (\$590.5 million settlement was achieved on behalf of purchasers of certain investment vehicles who had alleged that certain private equity firms had conspired to artificially suppress the value of the investments);
- *In re Currency Conversion Antitrust Litigation*, MDL No. 1409 (S.D.N.Y.) (\$336 million settlement of claims alleging a conspiracy to require credit card holders to arbitrate all legal disputes and give up any right to participate in class actions);
- *In re Provident Financial Corp. Credit Card Terms Litigation*, MDL No. 1301 (E.D. Pa.) (\$105 million settlement was achieved on behalf of a class of credit card holders who were charged excessive interest and late charges on their credit cards);

- *The Vulcan Society, Inc. v. The City of New York*, No. 1:07-cv-02067 (E.D.N.Y.) (\$100 million settlement and significant injunctive relief was obtained for a class of black applicants who sought to be New York City firefighters, but were denied or delayed employment due to racial discrimination); and
- *In re Prudential Ins. Co. SGLI/VGLI Contract Litigation*, MDL No. 2208 (D. Mass.) (\$40 million settlement was achieved on behalf of a class of military service members and their families who had purchased insurance contracts);

The quality of Scott+Scott's representation is recognized by courts. For example, in litigation relating to the Ponzi scheme perpetrated by Bernard Madoff, where Scott+Scott obtained a temporary restraining order benefiting New York University that prevented the siphoning off of over \$200 million from a Bernard Madoff feeder fund, the court complimented Scott+Scott's advocacy, stating:

Scott+Scott did a superlative job in its representation[.] . . . Scott+Scott has demonstrated a remarkable grasp and handling of the extraordinarily complex matters in this case. The extremely professional and thorough means by which NYU's counsel has litigated this matter has not been overlooked by this Court. They have possessed a knowledge of the issues presented and this knowledge has always been used to the benefit of all investors.

NYU v. Ariel Fund Ltd., No. 603803/08, Order at 9-10 (N.Y. Supr. Ct. Feb. 22, 2010).

PARTNER BIOGRAPHIES

Joseph P. Guglielmo has focused his practice in the areas of consumer, antitrust, and securities class action litigation for over 20 years. Mr. Guglielmo currently serves in the leadership of numerous class actions, including: *In re The Home Depot, Inc., Customer Data Security Breach Litigation*, MDL No. 2583 (N.D. Ga.) (co-lead counsel, \$27.25 million settlement on behalf of class of financial institutions in a data breach case involving the theft of the personal and financial information of over 40 million credit and debit card holders); *Bellwether Community Credit Union v. Chipotle Mexican Grill*, No. 1:17-cv-01102 (D. Colo.) (co-lead counsel, asserting claims on behalf of class of financial institutions involving theft of payment card data); and *In re CIGNA Corporation PBM Litigation*, No. 3:16-cv-01702 (D. Conn.) (chair of executive committee, asserting RICO and ERISA claims on behalf of nationwide class of plan participants involving overcharge of copayments for prescription drugs). Mr. Guglielmo also is actively involved in *In re Foreign Exchange Benchmark Rates Antitrust Litigation*, No. 1:13-cv-07789 (S.D.N.Y.) (settlements of approximately \$2.2 billion arising out of claims on behalf of purchasers of foreign exchange instruments alleging violations of federal antitrust laws), and *In re Disposable Contact Lens Antitrust Litigation*, MDL No. 2626 (M.D. Fla.) (motion to dismiss claims alleging industry-wide price fixing denied). Mr. Guglielmo previously served in a leadership capacity, achieving significant recoveries, in consumer MDL and class cases such as:

- *In re Managed Care Litigation*, MDL No. 1334 (S.D. Fla.) (settlements in excess of \$1 billion obtained on behalf of certified class of medical providers who alleged that certain managed care organizations engaged in improper billing practices in violation

of RICO);

- *Love v. Blue Cross and Blue Shield Ass'n*, No. 1:03-cv-21296 (S.D. Fla.) (settlements of approximately \$130 million in cash and other prospective benefits valued in excess of \$2 billion obtained on behalf of class of medical providers who alleged that certain health insurance companies conspired to reduce payments in violation of RICO);
- *In re Insurance Brokerage Antitrust Litigation*, MDL No. 1897 (D.N.J.) (settlements exceeding \$180 million obtained on behalf of class of purchasers of insurance products who alleged that certain insurance companies and brokerages fixed prices associated with the sale of insurance in violation of RICO and antitrust laws);
- *NYU v. Ariel Fund Ltd.*, No. 603803/08, (N.Y. Supr. Ct.) (temporary restraining order prohibiting transfer of approximately \$1 billion in assets and \$323 in deferred compensation regarding Bernard Madoff feeder fund); and
- *WinSouth Credit Union v. Mapco Express, Inc.*, No. 3:14-cv-01573 (M.D. Tenn.) (largest dollar-per-payment-card recovery achieved in data breach case brought on behalf of class of financial institutions).

In addition to his litigation successes, Mr. Guglielmo is an expert on electronic discovery, a subject on which he frequently lectures, and is a member of the Steering Committee of Working Group 1 of the Sedona Conference[®], an organization devoted to providing guidance and information concerning discovery issues involved in litigation and a member of the Advanced eDiscovery Institute Advisory Board of Georgetown University Law School.

Erin Green Comite presently represents financial institutions in several data security class actions, including as co-lead counsel in *First Choice Federal Credit Union v. The Wendy's Co.*, No. 2:16-cv-00506 (W.D. Pa.) (motion to dismiss denied); and as a member of the plaintiffs' steering committee in *In re Arby's Restaurant Group, Inc. Data Security Litigation*, No. 1:17-cv-00514 (N.D. Ga.); and *Greater Chautauqua Federal Credit Union v. Kmart Corporation*, No. 1:15-cv-02228 (N.D. Ill.) (settlement valued at \$13.4 million). She also played a significant role in both *In re: The Home Depot, Inc., Customer Data Security Breach Litigation*, MDL No. 2583 (N.D. Ga.) (\$27 million settlement) and *In re Target Corporation Customer Data Security Breach Litigation*, MDL No. 2522 (D. Minn.) (\$60 million settlement), two of the largest data breaches impacting payment card data to date. She also is plaintiffs' counsel for financial institutions in *Bellwether Community Credit Union v. Chipotle Mexican Grill*, No. 1:17-cv-01102 (D. Colo.) and *Veridian Credit Union v. Eddie Bauer LLC*, No. 2:17-cv-00356 (W.D. Wa.), representing financial institutions in connection with alleged data breach incidents, and is active in *Alaska Electrical Pension Fund v. Bank of America Corporation*, No. 1:14-cv-07126 (S.D.N.Y.), which alleges a conspiracy to fix the ISDAfix interest rate for derivatives and other financial instruments at artificial levels.

Currently, Ms. Comite is at the forefront of consumer class action litigation, representing aggrieved consumers in numerous cases, such as: *In re CIGNA Corporation PBM Litigation*, No. 3:16-cv-01702 (D. Conn.) (claims involving wrongfully obtaining excess payments from prescription drug transactions through mechanisms known as spreads and clawbacks); *Forth v. Walgreen Co.*, No. 1:17-cv-02246 (N.D. Ill.) (claims involving the overcharging for generic

prescription drugs); and *Luca v. Wyndham Worldwide Corp.*, No. 2:16-cv-00746 (W.D. Pa.) (claims involving the overcharging of consumers for hidden hotel fees). She also has served in leadership positions and settled a variety of consumer class cases, such as *Morrow v. Ann, Inc.*, No. 1:16-cv-03340 (S.D.N.Y.) (preliminary approval granted, \$8.1 million settlement); *Howerton v. Cargill, Inc.*, No. 1:13-cv-00336 (D. Haw.) (\$6.1 million settlement); *Murr v. Capital One Bank (USA), N.A.*, No. 1:13-cv-01091 (E.D. Va.) (\$7.3 million settlement); *In re Monsanto Company Genetically-Engineered Wheat Litigation*, MDL No. 2473 (D. Kan.) (\$2.4 million settlement); and *In re Nutella Mktg. & Sales Practices Litig.*, No. 3:11-cv-01086 (D.N.J.) (\$2.5 million settlement). Ms. Comite's appellate victories in consumer class actions include *Chavez v. Nestle USA, Inc.*, 511 F. App'x 606 (9th Cir. 2013) (achieving a reversal of dismissal) and *In re Nutella Mktg. & Sales Practices Litig.*, 2014 WL 4801262 (3d Cir. Sept. 29, 2014) (defending settlement from professional objectors).

While Ms. Comite is experienced in all aspects of complex pre-trial litigation, she is particularly accomplished in achieving favorable results in discovery disputes. In *Hohider v. United Parcel Service, Inc.*, No. 2:04-cv-00363 (W.D. Pa.), Ms. Comite spearheaded a nearly year-long Special Master investigation into every facet of UPS's document preservation methods. In reaction to UPS's flagrant discovery abuses brought to light through the investigation, the court in that case conditioned the parties' settlement of the case on UPS implementing preservation practices that passed the Special Master's approval. Ms. Comite's investigation skills were developed, prior to entering law school, when she served in the White House as Assistant to the Special Counsel to President Clinton. In that capacity, she handled matters related to the White House's response to investigations, including four independent counsel investigations, a Justice Department task force investigation, two major oversight investigations by the House of Representatives and the Senate, and several other congressional oversight investigations.